

REMARKS

The Office Action dated December 17, 2010 has been reviewed and carefully considered. Claims 6-11 and 13-17 remain present in the application, with claims 6, 10 and 15 being the only independent claims. Reconsideration of the above-identified application in view of the following remarks is respectfully requested.

Claims 6-11 and 13-14 stand rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. In particular, the Office Action asserts that the feature recited in claims 6 and 10, “‘wherein said rotation of each light guide is performed independently of any movement of the light guide’s corresponding light source,’ was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention” (Office Action, page 2, third full paragraph).

Applicants respectfully disagree with, and explicitly traverse, the Examiner's reason for rejecting the claims.

The first paragraph of page 3 of the Office Action lists several passages of the application which the Examiner argues essentially teach away from this feature and leads the Examiner to the conclusion that “applicant’s original disclosure only supports that the illumination unit which includes a light guide and light source rotates as a whole unit”

(Office Action, page 3, second paragraph). Applicants wish to address each of these passages:

Paragraph 20 (“illumination unit 4 comprises two light sources 9 per light guide 6”):

This passage of the specification relates to the embodiment depicted in Fig. 3B in which LEDs are employed as the light source. That an (illumination) unit contains components does not require that those components be connected in any manner (to each other or even to the unit) – only that they be present in the unit. Further, Fig. 3B clearly indicates that there does not exist any physical connection between the light guide 6 and either illumination unit 9. Further, paragraph [0007] of the specification recites: “An interesting display apparatus according to the present invention is characterized in that that the light guides are rotatable [emphasis added] along a longitudinal axis.” Accordingly, the invention does not require that the light source (or even the illumination units) be so rotated. Consequently, Applicants submit that this passage fails to properly support the Examiner’s conclusion that “a light guide and light source rotates as a whole unit.”

Paragraph 25 (“each of the illumination units 4 comprise a longitudinal light guide with a light source on [emphasis added] each of both ends of the light guide”)

This passage of the specification relates to the embodiment of the invention in which blue, green and red LEDs are employed as light sources. Applicants submit that other than the use of the word “on,” this passage does not add any new issues to those raised in paragraph 20 which were addressed above. With respect to the word “on,”

Applicants submit that this word does not require any physical connection between the light source and the light guide. That is, referencing <http://www.yourdictionary.com/on> it is well-known that the word “on” can be defined to mean:

5a. **near to; by:** a cottage on the lake, seated **on** my right

5b. **having as its location:** a house **on** Main Street

13. **in the direction or vicinity of:** light shone **on** us

Further, Applicants wish to note that embodiments of the invention described in paragraph [006] of the application do not use the word “on” but rather are described as “each of the light guides is provided with a light source **at** both of its ends.” Consequently, Applicants submit that this passage fails to properly support the Examiner’s conclusion that “a light guide and light source rotates as a whole unit.”

Paragraph 23 (“returning to figure 2, it is stressed that the **illumination units 4** [emphasis, Office Action] **can be** [emphasis, mine] rotated along the longitudinal axis as indicated by the arrows.”

Figure 2 relates to an embodiment of the invention “for providing a background light formed as two spots (5) on a wall (3)” (Paragraphs [0011] and [0017]). There is nothing in the specification requiring the feature quoted from this passage be present in all embodiments of the invention. Further, the passage merely teaches an optional movement (“can be”) of this particular embodiment. Moreover, that the illumination units themselves can be rotated to produce this result does teach anything with respect to

respective movements of the illumination unit's components relative to each other (i.e., the light guide and the illumination unit(s)).

Applicants submit that the language of paragraph 23 does not preclude independent movement of the light guide from that of the light source. Consequently, Applicants submit that this passage also fails to properly support the Examiner's conclusion that "a light guide and light source rotates as a whole unit."

In addition to the above "counter-arguments," Applicants wish to point to paragraph [0018] of the Office Action which relates to Fig. 3-A and states:

On a flat part of its [the light guide's] surface, a longitudinal structure (7) is prepared by means of printing. This structure causes that part of the light being inserted in the guide is **coupled out. Light can be coupled in at a flat end (8) of the light guide** [emphasis added] by means of light source (9). This light source can be an incandescent lamp or a halogen lamp. However, it is preferred to use one or more LEDs (10) for this purpose.

Fig. 3-A does not depict any direct physical connection between the light source and the light guide. Moreover, none is required. Applicants wish to note that the phrase "coupled in" of the light source in the above passage is analogous to the phrase "coupled out" of light from the light guides as described elsewhere in the specification (e.g. paragraphs [0018] and [0005]). Clearly, no physical connection is required for any receiving entity of the "coupled out" light. Accordingly, Applicants submit that as that term is used in the application, no physical connection is required for the "coupled in" of

the light source to the light guide. That is, Applicants submit that such “coupling” is merely directing light onto a receiving entity without requiring any physical connection.

In some situations, particularly those involving LEDs, it may appear beneficial to have a physical connection between the light source and the light guide. However, the invention clearly teaches other light sources may be used (e.g. paragraph [0024]) in which case such a physical connection may be less attractive.

In any event, the invention as described in the specification does not require a physical connection between the light source and the light guide. Moreover, the embodiments of the invention illustrated in Figs. 3A-C teach the absence of such a connection. Accordingly, the light guide is capable of rotation independent of its corresponding light source absent some requirement that both are physically attached to one object. Such a “mutual” physical attachment is not taught nor implied in the description of the invention.

For all of the reasons above, Applicants submit that the feature of independent claims 6 and 10, “wherein said rotation of each light guide is performed independently of any movement of the light guide’s corresponding light source,” is described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention. Accordingly, Applicants submit that independent claims 6 and 10 are in a condition for allowance.

Claim 15 was indicated as being allowable in the Office Action.

Claims 7-9, 11, 13, 14, 16 and 17 are dependent from one of the independent claims discussed above, and are believed allowable for at least the same reasons and any rejections thereof should be withdrawn. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

Applicants deny any statement, position or averment stated in the Office Action that is not specifically addressed by the foregoing. Any rejection and/or points of argument not addressed are moot in view of the presented arguments and no arguments are waived and none of the statements and/or assertions made in the Office Action is conceded.

For all the foregoing reasons, it is respectfully submitted that all the present claims are patentable in view of the cited references. A Notice of Allowance is respectfully requested.

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